

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TRUSTEES OF THE PAVERS AND ROAD BUILDERS  
DISTRICT COUNCIL WELFARE, PENSION, AND  
ANNUITY FUNDS and THE TRUSTEES OF THE  
LOCAL 1010 APPRENTICESHIP, SKILL  
IMPROVEMENT, AND TRAINING FUND,

24 CV 4622 (BMC)

**NOTICE OF MOTION**

Plaintiffs,

-against-

WESTBURY EQUIPMENT CORP.,

Defendant.

TO THE CLERK OF THE COURT and COUNSELORS:

PLEASE TAKE NOTICE, that upon the annexed declaration of Adrianna R. Grancio, Esq., dated August 13, 2024, and the exhibits annexed thereto; the annexed declaration of Keith Loscalzo, dated August 6, 2024, and the exhibits annexed thereto; the annexed declaration of Joseph Montelle, dated August 7, 2024, and the exhibits annexed thereto; the annexed declaration of Jennifer Ebitz, dated August 12, 2024, and the exhibits annexed thereto; the annexed declaration of Robert Castiglia, dated August 12, 2024, and the exhibits annexed thereto; and the annexed Memorandum of Law, and upon all pleadings and proceedings heretofore had herein, the undersigned, on behalf of Plaintiffs, will move this Court before the Honorable Brian M. Cogan at the United States Courthouse, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order granting Plaintiffs' Motion for Default Judgment against Defendant Westbury Equipment Corp., and for such other and further relief as the Court deems proper and just.

Dated: New York, New York  
August 13, 2024

Respectfully submitted,

**VIRGINIA & AMBINDER, LLP**

By: /s/ Adrianna R. Grancio  
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*Attorneys for Plaintiffs*